

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

WORMSER, KIELY, GALEF & JACOBS LLP,

Plaintiff,

vs.

WORLD-LINK HOLDINGS, INC. and WORLD-  
LINK, INC.,

Defendants.

Civ. Action No. 08-CV-6013

**ANSWER OF DEFENDANTS,  
WORLD-LINK HOLDINGS, INC. AND WORLD-LINK, INC.**

The answer of World-Link Holdings, Inc. and World-Link, Inc. (collectively, the “Defendants”), alleges as follows:

1. The Defendants admit the allegations set forth in paragraphs 2, 12, and 13 of the Complaint.
2. The Defendants are without sufficient information to admit or deny the allegations of paragraphs 1, 3, 4, 5, 6, 7, 8, 9, and 10 of the Complaint and leave Plaintiff to its proofs at trial.
3. The Defendants deny knowledge or information sufficient to form a belief as to the truth of each and every allegation set forth in paragraph 11 of the Complaint except admit that World-Link Telecom, Inc. filed a Chapter 11 bankruptcy case in the United States Bankruptcy Court, District of New Jersey.

**AFFIRMATIVE DEFENSES**

**First**

4. The Defendants repeat and reallege each and every preceding allegation as if fully set forth at length herein.

5. All counts of the Complaint should be dismissed because they fail to state a cause of action upon which relief can be granted.

**Second**

6. The Defendants repeat and reallege each and every preceding allegation as if fully set forth at length herein.

7. All counts of the Complaint should be dismissed because Plaintiff has failed to plead with sufficient particularity to enable the Defendants to defend.

**Third**

8. The Defendants repeat and reallege each and every preceding allegation as if fully set forth at length herein.

9. All counts of the Complaint should be dismissed because Plaintiff has failed to correctly allocate the alleged fees between the Defendants and third-party, World-Link Telecom, Inc.

**Fourth**

10. The Defendants repeat and reallege each and every preceding allegation as if fully set forth at length herein.

11. The relief requested by Plaintiff should be denied, or at least limited, as the result of partial payments made or to be made by the Defendants and/or third parties.

**WHEREFORE**, the Defendants seek an order and judgment as follows:

- a. Dismissing all counts of the Complaint with prejudice;
- b. awarding the Defendants their costs and attorney's fees in defending this action; and

c. granting the Defendants such other relief as is just.

**RABINOWITZ, LUBETKIN & TULLY, LLC**

*Attorneys for Defendants, World Link Holdings, Inc.  
and World-Link, Inc.*

By: /s/ Barry J. Roy  
BARRY J. ROY

Dated: July 3, 2008

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